

Hunter v. Durr

06 - CV - 00411

Exhibit G

**to Plaintiff's Suggestions in Opposition
to Defendant's Motion for Summary Judgment**

Accident Report Authored by Christian Rathsack



Accident Report

Project: Hyundai Alabama
Station: TopCoat2, BaseCoat-Air
Author: Christian Rathsack

Course of events:

On January 27, 2005, I, Christian Rathsack, showed an industrial photographer round the paint lines at HMMA upon Bruno Welsch's request. I agreed with the photographer that she could take photos in TopCoat2.

The photographer wanted to take pictures of the inside of the ESTA-BC booth. For this purpose I stopped a body in BC-Air (previous station) and switched this station off when the painting process was finished.

Together with the photographer I then entered the BC-Air booth, and we positioned the tripod with camera at a suitable place. I then walked over to the control point of the ESTA-BC booth and started the conveyor.

When the body was level with robot 13 and 23, I looked inside the BC-Air booth and couldn't see the photographer anywhere. She had fallen into a "hole" in the booth floor, down into the scrubber. There was a "hole" because a grid in the floor covering of the conveyor system has been removed.

I immediately stopped the system and rushed to the photographer's rescue. I helped her get out of the scrubber and asked her if she needed help. But all she wanted was to have a break. After this break she continued to take pictures in the CC system.

When talking to the photographer, she told me that she had followed the body with the tripod and with her eye on the camera, and for this reason had not seen the missing grid.

I cannot, at the moment, explain why I hadn't thought of the "hole" before. Maybe the car body had covered up the hole while we had been positioning the camera.

Background information to explain why the grid had been removed:

On Friday, January 14, 2005, R11 of station TC2 BC-Air had collided with a body. The reason for the collision was a protruding grid which was blocking the skid, which meant that the object position for the robot was not correct.

After this collision, I immediately informed HMMA's maintenance department and asked them to fix the grid properly.

The maintenance department looked into the matter, but unfortunately with no discernible improvement.

I then showed Mr. Inho Lee this area and the grid that was still protruding, and we agreed to take the grid out so that we could continue to run production.